



COMMONWEALTH OF PENNSYLVANIA  
DEPARTMENT OF ENVIRONMENTAL RESOURCES

1875 New Hope Street  
Norristown, PA 19401  
215 270-1975

September 26, 1990

Mr. David R. Haldeman  
Scott Paper Company  
Front and Avenue of the States  
Chester, PA 19013

Re: ~~CONFIDENTIAL~~  
Scott Paper - Chester Facility  
City of Chester  
Delaware County

NOTICE OF VIOLATION

Dear Mr. Haldeman:

We have completed our review of your July 16, 1990 submission consisting of a cover letter, the November 9, 1989 "Subsurface Soils Investigation" completed by Triegel and Associates, Inc., and the January 22, 1990 letter from Mr. Daniel E. Ressler of Triegel and Associates detailing the backhoe trench investigation. The information presented indicates that there has been a release of No. 2 fuel oil which resulted in the accumulation of a layer of free product on the ground-water table at this facility. The source of the oil has not been definitively identified, however, a release from fuel oil tank No. 4 in January 1989 and a release from a barge unloading pressurization line discovered in January 1990 are suspected.

The unpermitted discharge of petroleum products to waters of the Commonwealth (including ground water) is a violation of Sections 307 and 401 of the Clean Streams Law, the Act of June 22, 1937, P.L. 1987, as amended and as such is subject to the penalties therein. Furthermore, Section 316 of the Clean Streams Law requires that landowners or occupiers correct conditions which are causing or have the potential to cause pollution. Title 25, Chapter 101, Sections 101.2(b) and 101.3 of the Rules and Regulations of the Department of Environmental Resources requires that you remove any residual contamination from the ground and from the affected waters of the Commonwealth.

We concur with your proposed course of action with regard to ground-water remediation of the No. 2 fuel oil at this site, however, you must submit a ground-water monitoring plan for review and comment by October 29, 1990. Greater detail is needed for the proposed in situ bioremediation of the contaminated soil. An evaluation of the feasibility and effectiveness of this treatment technology along with specific details of the system construction must be submitted for review and comment by November 15, 1990. In addition, bi-monthly reports detailing the progress made toward remediating the oil should be submitted beginning October 1990.

Mr. David R. Haldeman  
September 26, 1990

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Should you have any questions, you may contact Richard Breitenstein, Water Quality Specialist, or me at 215 270-1975.

Very truly yours,

*Kelly J. Kinkaid*

KELLY L. KINKAID  
Hydrogeologist

cc: Mr. O'Neil  
Ms. Steele  
Mr. Breitenstein  
City of Chester  
● (5)264.5